

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF GEORGIA
BRUNSWICK DIVISION**

WANDA COOPER, in her individual capacity and as administrator of the estate of the decedent, Ahmaud Arbery,

Plaintiff,

V.

TRAVIS McMICHAEL, GREGORY
McMICHAEL, WILLIAM BRYAN,
POLICE OFFICER ROBERT RASH,
POLICE OFFICER JOHN POWELL,
JOHN DOE POLICE OFFICIALS 1-10,
GLYNN COUNTY, JACKIE JOHNSON,
and GEORGE BARNHILL,

Defendants.

CIVIL ACTION NO.
2:21-CV-00020-LGW-BWC

**DEFENDANT GEORGE BARNHILL’S CONSENT MOTION FOR AN
EXTENSION OF TIME TO RESPOND TO PLAINTIFF’S COMPLAINT**

COMES NOW, Defendant George Barnhill, by and through undersigned counsel, and files this Consent Motion for an Extension of Time for Defendant Barnhill to Respond to Plaintiff's Complaint, as set forth below. Plaintiff Wanda Cooper consents to the filing of this Motion.

Defendant, in good faith, seeks an extension of time to file its answer or responsive pleading to Plaintiff's Complaint. In order to prepare a response to Plaintiff's Complaint, Defendant requests that its deadline for responding to Plaintiff's Complaint be extended for the period of time permitted to other

Defendants who waived service of summons under Rule 4 of the Federal Rules of Civil Procedure. According to the Court's docket the other Defendants' responsive pleading is due on July 10, 2021. [See Docs. [20](#), [21](#), [22](#)]. Thus, Defendant Barnhill requests the same period of time; that his responsive pleading be due on July 10, 2021.

Defendant's counsel has contacted Plaintiff's counsel regarding the requested extension. Plaintiff is unopposed to this requested extension for the deadline of Defendant's responsive pleading until July 10, 2021.

This case is not currently on any pre-trial calendar and discovery has not yet commenced. Therefore, the granting of this extension will not require the rescheduling of any timing orders or published calendar.

This 21st day of May, 2021.

APPELBAUM HENEFELD GREEN, P.C.
/s/ Noah Green
Noah Green
Georgia Bar No. 468138
Attorney for Defendant Barnhill

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Defendants.

CERTIFICATE OF SERVICE

This is to certify that I have this day served all counsel of record with a copy of **Defendant Barnhill's Consent Motion for an Extension of Time to Respond to Plaintiff's Complaint** by filing same with the Clerk of Court using the CM/ECF system which will send notification of such filing to all counsel of record.

This 21st day of May, 2021.

APPELBAUM HENEFELD GREEN, P.C.

/s/ Noah Green

Noah Green

Georgia Bar No. 468138

Attorney for Defendant

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